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February 23, 2024

MEMO ENDORSED**Via Electronic Filing**

Honorable Paul G. Gardephe
 United States District Court
 Southern District of New York
 40 Foley Square, Room 2204
 New York, New York 10007

Re: Techtronic Cordless GP v Maersk A/S

Case No. 1:23-cv-2739-PGG

Letter Motion for Adjournment of Conference or Telephone Conference

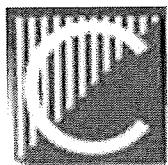
*The conference is adjourned**to April 3, 2024 at 10:00 A.M.***SO ORDERED:**
Paul G. Gardephe, U.S.D.J.Dated: Feb. 23, 2024

Dear Judge Gardephe,

Plaintiff Techtronic Cordless GP (hereinafter “Plaintiff”), by and through undersigned counsel, respectfully submits this joint letter motion pursuant to Section I.D. of this Honorable Court’s individual practices to request an adjournment of the February 26, 2024 Status Conference, or in the alternative, to have the conference converted to a telephone conference. In support thereof, the Parties respectfully shows as follows:

Counsel for the parties believe that they are very close to reaching an agreement in principle to resolve this matter. The parties have not had discovery disputes and are not seeking further extensions of the Court’s case management schedule and/or motion deadlines. Undersigned counsel for Plaintiff is based in Houston, Texas and is ready, willing, and able to travel to New York to be present for the in-person conference on Monday.¹ However, given the posture of this matter, the good faith expectation that it will soon be resolved (and off the Court’s docket), and that the parties do not have any discovery disputes which they plan to raise to the Court at the February 26, 2024 conference, it is respectfully requested that the status conference either be adjourned for thirty (30) days or converted to a telephone conference. Counsel for Maersk A/S agrees to and joins in the request.

¹ Respectfully, undersigned counsel’s partner, George M. Chalos, Esq. who is based in New York and ordinarily would cover the conference in Mr. Sparkman’s absence is scheduled to be in Salt Lake City, Utah the entire week of February 26, 2024, as his spouse is having reconstructive knee surgery next week.



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In advance, we thank the Court for its consideration of the request.

Respectfully submitted,

Chalos & Co, P.C.

Briton P. Sparkman

Enc.

cc: Via ECF

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